

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____
v. : **DATE FILED:** _____
JAFEIR BETRAND : **VIOLATIONS:**
: **18 U.S.C. § 371 (conspiracy – 1 count)**
: **18 U.S.C. § 2119 (carjacking – 1 count)**
: **18 U.S.C. § 924(c)(1)(A)(ii) (using, carrying,**
: **and brandishing a firearm during and in**
: **relation to a crime of violence – 1 count)**
: **18 U.S.C. § 2 (aiding and abetting)**

INDICTMENT

THE GRAND JURY CHARGES THAT:

1. From in or about April of 2023 through in or about June of 2023, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

JAFEIR BETRAND

conspired and agreed with others known and unknown to the Grand Jury to commit an offense against the United States, that is, to knowingly and unlawfully take or attempt to take with intent to cause death and serious bodily harm and through force and violence, and by intimidation, motor vehicles that had been transported, shipped, and received in interstate and foreign commerce, in violation of 18 U.S.C. § 2119.

MANNER AND MEANS

It was part of the conspiracy that:

1. Defendant JAFEIR BETRAND, and others known and unknown to the Grand Jury, stole license plates from other vehicles and affixed them to stolen and carjacked

vehicles that they used to commit other carjackings and other offenses to avoid being detected by law enforcement.

2. Defendant JAFEIR BETRAND and others known and unknown to the Grand Jury used vehicles already in their possession to drive themselves to and from the carjacking locations, with at least one co-conspirator driving the carjacked car away and at least one co-conspirator driving the original car away.

3. Defendant JAFEIR BETRAND and others known and unknown to the Grand Jury approached victims and assaulted or threatened the victims, often by brandishing firearms, and took the vehicles by force.

4. Defendant JAFEIR BETRAND and others known and unknown to the Grand Jury, robbed their victims of additional possessions, to include their cell phones.

5. Defendant JAFEIR BETRAND, and others known and unknown to the Grand Jury, used cellular telephones to communicate with each other before, during and after carjackings and attempted carjackings, in order to discuss, coordinate, and further the object of the conspiracy.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, defendant JAFEIR BETRAND, and others known and unknown to the Grand Jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

On or about May 1, 2023:

1. Defendant JAFEIR BETRAND, and others known and unknown to the Grand Jury, stole license plate PA ZTS-5524, from a 2022 White Dodge Ram pickup truck in

Bensalem, Pennsylvania, and affixed the stolen license plate, PA ZTS-524 to a 2022 Dodge Ram pickup truck, VIN 1C6RR6LG0NS169611, stolen from Enterprise Rent a Car.

2. Defendant JAFEIR BETRAND, and others known and unknown to the Grand Jury, drove a white Dodge Ram pickup truck, bearing license plate PA ZTS-524, from Bensalem, Pennsylvania to the vicinity of Academy Road and Chalfont Drive, Philadelphia, Pennsylvania.

3. Defendant JAFEIR BETRAND, and others known and unknown to the Grand Jury, took with intent to cause death and serious bodily harm and through force and violence, and by intimidation, a 2010 Toyota Camry, VIN 4T1BF3EK1AU112492, license plate PA JRG-4289, from D.D. a person known to the Grand Jury, in the vicinity of Academy Road and Chalfont Drive, Philadelphia, Pennsylvania, and in the course of the carjacking brandished a firearm.

4. Between on or about June 2 and June 3, 2023, defendant JAFEIR BETRAND, and others, drove a white Dodge Ram pickup truck, bearing license plate PA ZTS-524, to New York, New York.

On or about June 3, 2023:

5. Defendant JAFEIR BETRAND, and others known and unknown to the Grand Jury, drove a white Dodge Ram pickup truck to the vicinity of W. 9th Street and Columbia Street, Brooklyn, New York.

6. Defendant JAFEIR BETRAND, and others known and unknown to the Grand Jury, took with intent to cause death and serious bodily harm and through force and violence, and by intimidation, a 2017 Toyota Camry, bearing license plate NY T661652C from G.L, a person known to the Grand Jury, in the vicinity of W. 9th Street and Columbia Street, Brooklyn, New York, and in the course of the carjacking brandished a firearm.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 1, 2023, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

JAFEIR BETRAND

and persons known and unknown to the Grand Jury, with intent to cause death and serious bodily harm, took, and aided and abetted the taking of, from the person and presence of D.D., a person known to the grand jury, by force and violence, and by intimidation, a motor vehicle, that is, a 2010 Toyota Camry, VIN 4T1BF3EK1AU112492, license plate PA JRG-4289, that had been transported, shipped, and received in interstate commerce.

In violation of Title 18, United States Code, Sections 2119 and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 1, 2023, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

JAFEIR BETRAND,

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a black semi-automatic pistol, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, carjacking, and aiding and abetting, in violation of Title 18, United States Code, Sections 2119 and 2, as charged in Count Two of this indictment, and that firearm was brandished.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

A TRUE BILL:


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JACQUELINE C. ROMERO
UNITED STATES ATTORNEY

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

JAFEIR BETRAND

INDICTMENT

Counts:

18 U.S.C. § 371 (conspiracy – 1 count)

18 U.S.C. § 2119 (carjacking – 1 count)

18 U.S.C. § 924(c)(1)(A)(ii) (using, carrying, and brandishing a firearm during and in relation to a crime of violence – 1 count)

18 U.S.C. § 2 (aiding and abetting)

Filed in
On _____

day,

Bail, \$ _____